



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

DEC 23 2019

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

URGENT LEGAL MATTER
REQUIRES PROMPT RESPONSE

Leonard Roberts
Roberts Brothers Lumber Company, Inc.
1450 Spruce Corner Road,
Ashfield, MA 01330

Re: Clean Air Act Reporting Requirement

Dear Mr. Roberts:

The United States Environmental Protection Agency ("EPA") is evaluating whether Roberts Brothers Lumber Company, Inc. ("Roberts Brothers"), located at 1450 Spruce Corner Road, Ashfield, Massachusetts ("the facility"), is in compliance with the Clean Air Act ("CAA" or "Act") and requirements promulgated under the Act.

Section 114(a)(1) of the Act, 42 U.S.C. § 7414(a)(1), gives EPA the authority to require any person who owns or operates any emission source to establish and maintain records, make reports, sample emissions, and provide such other information as may reasonably be required to enable EPA to determine whether such person is in compliance with the Act and its implementing regulations.

In particular, EPA is evaluating the facility's compliance with the National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, found at 40 C.F.R. Part 63, Subpart ZZZZ.

Reporting Requirement

1. By January 10, 2020, provide the following information about the Detroit Diesel and Caterpillar stationary generators located at the facility:
 - a. The purpose (e.g., to provide mechanical power, to provide electrical power, emergency generator, fire pump, etc.);
 - b. The manufacturer, model number, and serial number;
 - c. The month, day, and year of manufacture;
 - d. The month, day, and year of installation;
 - e. The fuel type;
 - f. The maximum capacity (in brake horsepower, horsepower and kilowatts);
 - g. Whether the engine has an emissions control system, the type of system, and when it was installed; and
 - h. Daily hours of operation for the months October, November and December 2019;
2. By no later than the 10th day of each month, beginning in February 2020 and continuing through January 2021, provide the daily hours of operation for the prior month for each generator.
3. During EPA's visit to the facility on November 15, 2019, Roberts Brothers indicated it stopped running the Detroit Diesel generator sometime in October 2019. By January 10, 2020, provide the date Roberts Brothers stopped running this generator in October 2019.
4. During EPA's visit to the facility on November 15, 2019, Roberts Brothers indicated that the Caterpillar generator is not operational. By January 10, 2020, provide the date this generator was last used.

Be aware that if Roberts Brothers does not provide the information required in this Reporting Requirement in a timely manner, EPA may order it to comply and may assess monetary penalties under Section 113 of the Clean Air Act. Federal law also establishes criminal penalties for providing false information to EPA. This letter is not subject to Office of Management and Budget review pursuant to the Paperwork Reduction Act, 44 U.S.C. Chapter 35.

You may assert a business confidentiality claim covering part or all of the information requested, in the manner described by 40 CFR § 2.203(b). Information covered by such a claim will be disclosed by EPA only to the extent, and by means of the procedures, set forth in 40 CFR Part 2, Subpart B. Note that certain categories of information, such as emission data, are not properly the subject of such a claim. If no such claim accompanies the information when EPA receives it, EPA may make the information available to the public without further notice to you.

Provide the above-required information to:

Darren Fortescue
Enforcement and Compliance Assurance Division
US EPA Region 1
Mail Code 04-2
5 Post Office Square Suite 100
Boston, Massachusetts, 02109-3912

If you have any questions regarding this Reporting Requirement, please contact Darren Fortescue at (617) 918-1162, or have your attorney contact Tom Olivier at (617) 918-1737.

Sincerely,

A handwritten signature in dark ink, appearing to read "Karen McGuire", with a stylized flourish at the end.

Karen McGuire, Director
Enforcement and Compliance Assurance Division

cc: Saadi Motamedi, MassDEP WERO